

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: : Chapter 13
: :
DONNA LAGHJICHI : 3/10/2020 10:30 A.M.
: Courtroom # 2
: :
: Case No. 19-11399

**ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY**

1. Admitted.
2. Admitted
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted in part, Denied in part. While the Debtor's original Chapter 13 Plan did state post-petition payments would be tendered directly outside of the plan, the Second Amended Chapter 13 Plan, filed on 12/4/19 at docket no. 41, lists the account in section 4(d) as a secured creditor to be paid in full through the Chapter 13 plan. The Second Amended Chapter 13 Plan was confirmed on January 9, 2020, without objection from Movant.
8. Denied. As stated in paragraph 7, the full balance of the loan is to be paid through the debtor's Chapter 13 Plan.
9. Denied.

10. Denied. It is Denied Movant lacks adequate protection, as their claim is being provided for in full in the confirmed Second Amended Chapter 13 Plan.
11. Denied.
12. Denied.
13. Denied

WHEREFORE, it is requested that this Honorable Court DENY and DISMISS movant's Motion for Relief from the Automatic Stay, or in the alternative approve a stipulation permitting the Debtors to become current on any missed post-petition payments.

Respectfully Submitted,

YOUNG, MARR & ASSOCIATES

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